

IN THE SUPREME COURT OF THE UNITED STATES

No. 22-1074

George Sheetz,

*Petitioner*

v.

County of El Dorado, California,

*Respondent.*

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**Certificate of Compliance With  
Word Limitation**

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation as *Amicus Curiae* In Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **2,969 words**. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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